

# **EXHIBIT 2**



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west virginia department of environmental protection

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**RESPONSIVENESS SUMMARY  
WEST VIRGINIA/NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
(WV/NPDES) PERMIT NO. WV0117986**

**July 15, 2024**

The Department of Environmental Protection's (DEP) Division of Water and Waste Management (DWWM) would like to take this opportunity to thank those who attended the public hearing as well as those individuals who submitted written comments on the proposed West Virginia/National Pollutant Discharge Elimination System (WV/NPDES) Permit WV0117986 for the Chemours Company FC, LLC (herein after "permittee").

The DWWM published a Class I Legal advertisement in the "Parkersburg News and Sentinel" newspaper on January 2, 2024 announcing the agency's intent to issue the permit. The DWWM also published a Class I Legal advertisement in the "Parkersburg News and Sentinel" newspaper on January 31, 2024 providing notification of a public hearing. A virtual public hearing was held on March 4, 2024 in an additional effort to gain public input on the draft permit. After the public hearing, the written comment period expired on March 14, 2024.

During the public hearing, oral comments were heard and recorded to produce a transcript of the public hearing. Additionally, the DWWM Permitting Section received written comments as well. A Responsiveness Summary has been prepared in lieu of a response letter to each commenter. The Responsiveness Summary highlights the issues and concerns that were identified during the public hearing and/or contained in the written comments received during the comment period. In many cases, multiple comments were provided on specific subjects or issues, and both the comments and the responses have been summarized to the extent possible. Please note that some comments provided may not have been pertinent to the specific permit application being considered and responses may not have been provided since those comments were not germane to this permit. Comments provided after March 14, 2024 were not considered in this responsiveness summary.

Summarized comments will appear first, followed by the agency's response appearing in bold type.

1. Some commenters expressed concerns with the agency's assessments to protect water quality standards in the Ohio River. Several commenters indicated that the agency should either use EPA's revised human health advisories or draft MCLs for certain PFAS compounds in the agency's assessment for the protection of water quality standards.

**Since the permit was sent to public notice, the USEPA finalized its MCLs for HFPO-DA and PFOA. The agency has revised the final permit to use the new MCLs for HFPO-DA (10 ng/l) and PFOA (4 ng/l) to be protective of the State's narrative water quality criteria for human health and the designated uses of the Ohio River in this permit. These values were used as the water quality criterion for the protection of the State's narrative water quality criteria in the Tier 2 and Tier 1 assessments. These assessments resulted in the effluent limits for PFOA at Outlet 008 becoming more stringent in the final permit.**

2. Some commenters requested that the permittee be required to notify downstream drinking water utilities in case of a spill, permit limit exceedance, upset, or bypass beyond the agency's requirements in the permit.

**The agency's authority regarding the WV/NPDES Permit extends to the notification requirements contained in the permit regarding the agency's spill hotline.**

3. Some commenters requested that the permit expand upon the re-opener clause regarding revised effluent guidelines to include provisions for potential future revisions to drinking water regulations or water quality standards.

**The permit contains general clauses in Appendix A.I which afford the agency the ability to re-open the permit based upon other causes.**

4. Some commenters indicated that the levels of HFPO-DA and PFOA in the Ohio River are too high for the WVDEP to authorize any further discharge of these pollutants.

**As noted in the response to Comment #1 above, the agency revised its water quality assessment for HFPO-DA and PFOA in the final permit. The average background level used by the agency for PFOA was above the MCL used to protect narrative water quality criteria. As such, the water quality-based effluent limitations for PFOA were imposed at the end-of-pipe at Outlet 008 with no mixing zone considered. The technology-based assessment for HFPO-DA was still more stringent than the water quality-based assessment for HFPO-DA at Outlet 008 and no revisions to the HFPO-DA limits at Outlet 008 were made. The agency believes its water quality-based assessments, including the antidegradation review, at Outlet 008 are appropriate.**

5. Some commenters indicated that the permit must contain further assessments of water quality and technology-based effluent limits for other PFAS compounds that are being monitored.

**It is unclear what levels of other PFAS compounds may be present in the wastewater. While monitoring is required for other PFAS compounds in WV/NPDES Permit No. WV0001279 for Chemours Washington Works, the monitoring only consists of data at the main discharges in that permit. Outlet 005 in that permit contains numerous wastewater streams and the effluent quality at Outlet 005 would not be considered representative of the effluent quality from specific wastewater streams such as PFAS Finishing Line 2. The agency has incorporated Section A.118 into the final permit to require influent monitoring for PFAS compounds (in conjunction with the PFAS monitoring requirements already imposed in Section A.108) in order to characterize pollutant removals from the GAC treatment system. As such, monitoring for other PFAS compounds has been included in the permit (as well as the influent to the GAC treatment system at Internal Outlet 118) in order to collect data to characterize the wastewater streams in this permit. The agency also further believes this is consistent with the USEPA's December 5, 2022 Memorandum for Addressing PFAS Discharges in NPDES Permits.**

6. Some commenters indicated that the permit must contain more stringent technology-based effluent limits for HFPO-DA and PFOA in Section A.108. The agency used the calculation assessment procedures in Appendix E of EPA's Technical Support Document (TSD) which results in different limitations than the calculation assessment procedures in Table 5-2 of the TSD.

**The calculation procedures noted in Table 5-2 are water quality-based assessments for the protection of aquatic life water quality criteria under Section 5.4.1 of the TSD. Calculation procedures for water quality-based assessments for the protection of human health water quality criteria are found in Section 5.4.4 of the TSD. As noted, these procedures are for the assessment of water quality-based effluent limits and not technology-based effluent limits. The agency believes the calculation procedures in Appendix E are appropriate for the determination of technology-based effluent limits. Please note that the agency used the procedures in Section 5.4.4 of the TSD in its assessments of water quality-based limits at Outlet 008 for HFPO-DA and PFOA.**

7. Some commenters indicated that the permit require monitoring for additional PFAS compounds and total organic fluorine to capture a more representative measure of PFAS in the discharges.

**The agency believes the monitoring requirements imposed in the permit for the PFAS compounds are sufficient at this time and are in accordance with the USEPA's December 5, 2022 Memorandum for Addressing PFAS Discharges in NPDES Permits.**

8. Some commenters indicated that the WVDEP should require the permittee to make its PFAS monitoring data publicly available on a website.

Such a requirement is outside the agency's authority in an NPDES permit. However, please note that DMR data submitted to the agency is available for public review through the agency's online ApplicationXtender database at the following link, <https://documents.dep.wv.gov/AppXtender/datasources/DEPAX16/query/create/38>. The username and password for public access is DEP. Once logged in, type in the relevant permit number in the "Primary ID" field followed by selecting Discharge Monitoring Reports in the "Document Type" field and then click "Run".

9. Some commenters indicated that the temperature limits are not protective of water quality criteria. It was further indicated that the facility has not been granted a 316(a) thermal variance. It was further indicated that once per month monitoring for temperature is not sufficient to ensure compliance with the temperature effluent limits.

The permittee did not request, nor the agency grant, a 316(a) thermal variance in this permit. A 316(a) variance is not required in order for a permittee to obtain a mixing zone for temperature. The agency used appropriate background data, the water quality criteria, and mixing zone dilution factors to determine the water quality-based effluent limits in the permit. Please note that the monitoring frequency for effluent temperature monitoring in the draft permit is once per week and not once per month. Background monitoring for the Ohio River is prescribed as once per month. The agency believes that the monitoring and effluent limits for temperature in the permit are appropriate.

10. Some commenters indicated that the proposed operations and discharge under this permit cannot be issued under this new permit and must be permitted under existing WV/NPDES Permit No. WV0001279. Some commenters indicated that the EPA's suggestion that this permit be issued as a one-year permit is not good policy or complies with the Clean Water Act.

The agency believes the issuance of this permit is appropriate and consistent with discussions with the EPA.

11. Some commenters indicated that the permit request should be denied for various reasons such as historical non-compliance from Chemours and/or to disallow any additional PFAS to be discharged.

The agency believes that the terms and conditions contained in the permit are protective of water quality standards and other regulatory requirements. The agency's Environmental Enforcement Section promotes compliance by providing assistance, inspecting regulated sites, and enforcing conditions required by the permit and the WV Water Pollution Control Act. Complaints or suspected non-compliance may be reported to Environmental Enforcement by phone at (304) 926-0470 or by email at [dep.eewebcomplaint@wv.gov](mailto:dep.eewebcomplaint@wv.gov).

12. Some commenters indicated that the monitoring and reporting required by the permit should be conducted by an independent third party and not by the permittee.

There are two basic approaches to NPDES monitoring: self-monitoring and compliance-monitoring. Self-monitoring is performed by the permittee, while compliance monitoring usually refers to monitoring performed by the permitting authority. If there were an unlimited budget, a permitting authority might choose to collect all of the data itself as part of its oversight responsibilities or have all monitoring performed by an impartial third party whose sole purpose is to collect data. However, there is not an unlimited budget. Consequently, the NPDES Program relies on the permittee to self-monitor its discharge and self-report on its compliance status. The WVDEP's Laboratory Quality Assurance Program (LQAP) is responsible for accrediting environmental laboratories to ensure that the data generated for covered statutory program purposes is accurate, reproducible, and verifiable. This data is used to ensure compliance with permits, rules, and orders and to inform and guide department operations. LQAP personnel assess laboratories to ensure conformance with 47CSR32 - Regulations Governing Environmental Laboratories Certification and Standards of Performance which establishes minimum requirements, criteria, and procedures for laboratory equipment, practices, methodology, quality control, personnel, facilities, data reporting, and record maintenance. In addition, the permitting authority occasionally performs compliance monitoring to independently assess the permittee's self-monitoring efforts, and to demonstrate a regulatory presence that may help deter violations.

13. Some commenters inquired as to how often facilities are visited by Environmental Enforcement.

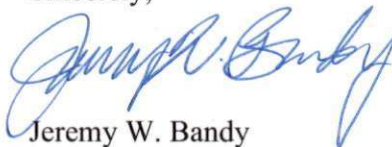
The DWWM's Environmental Enforcement section generally follows a routine comprehensive inspection frequency of at least once every other year for major individual permits (this is a major individual permit). Environmental Enforcement also routinely visits at a higher frequency for non-comprehensive inspections prompted by a variety of other factors including, but not limited to, complaints, spills, compliance issues, or on-site review of documentation submitted by the facility.

14. Some commenters asked how many fines have been imposed on Chemours.

There are several settlements between the USEPA and the E.I. DuPont de Nemours Company and the Chemours Company for the Washington Works facility. These settlements relate to different environmental statutes, including the Clean Water Act, Safe Drinking Water Act, and Toxic Substances Control Act. Fines were previously imposed on the prior owner, E.I. DuPont de Nemours Company.

The Division of Water and Waste Management issued WV/NPDES Permit No. WV0117986 on July 15, 2024. Within 30 days of the issuance date of this permit, anyone who may be adversely affected or aggrieved by the permit terms and conditions may file a Notice of Appeal with the Environmental Quality Board (EQB), 601 57<sup>th</sup> Street SE, Charleston, West Virginia 25304. Telephone (304) 926-0445. Please note that permit appeals are not handled by the DWWM and must be filed with the EQB for consideration. Thank you for your interest in this application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeremy W. Bandy", is written over the printed name.

Jeremy W. Bandy  
Director

JWB/ms

cc: Environmental Enforcement Supervisor  
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